

## REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the remarks herewith, which place the application into condition for allowance.

### I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-14 are currently pending.

### II. REJECTIONS UNDER 35 U.S.C. §103

Claims 1, 4, 5 and 12-14 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. U.S. Patent No. 6,593,969 to Driscoll et al. ("Driscoll") in view of U.S. Patent No. 6,476,869 to Sekine et al. ("Sekine");

Claims 2, 6-8, 10-11 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Driscoll in view of Sekine and further in view of U.S. Patent No. 5,652,621 to Adams, Jr. et al. ("Adams"); and

Claims 3 and 9 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. U.S. Patent No. 6,593,969 to Driscoll in view of Sekine and Adams and further in view of U.S. Patent No. 5,835,138 to Kondo.

Applicants respectfully traverse these rejections.

Independent claim 1 recites, *inter alia*:

"picture image conversion means for eliminating distortion of the entirety or a portion of the picture image selected by the selector means and for converting it into high quality picture image,

...

wherein the picture image conversion means eliminates distortion and converts to a high quality picture in a single step." (emphasis added).

Applicants re-assert the arguments presented in response to the Office Action of September 21, 2005 and December 28, 2005.

As understood by Applicants, and as pointed out in the Office Action, Sekine discloses an image capture and processing system that produces a higher-quality picture as a result of correcting image distortion. However, Sekine at col. 6, lines 32-36, states (in addition to the intrinsic advantage of having a higher-quality image by correcting image distortion) the Sekine device corrects the image distortion during the process of reproduction using information of aberrations that take place at the time of shooting where the image distortion results from the aberration of the photo-taking lens. That is, the Sekine device corrects image distortion due to an aberration in the imaging lens when the picture is taken. Hence, the Sekine device obtains a higher-quality image than the distorted picture. Stated differently, the Sekine device eliminates distortion introduced at the time the image is made.

In contrast, the present invention recites, “picture image conversion means for eliminating distortion . . . for converting it into high quality picture image . . . wherein the picture image conversion means eliminates distortion and converts to a high quality picture.” That is, in the present application, picture image conversion means can convert the received picture. That is, the picture whose distortion has already been eliminated. The picture image conversion means converts the picture whose distortion has already been eliminated into a higher quality picture image. That is, the present device can obtain a higher-quality picture than the picture whose distortion at the time the image was made has already been eliminated. The present application describes the operation of the picture image conversion means in the specification at, for example, page 26, line 9 to page 27, line 18.

Claim 1 is not obvious over Driscoll and Sekine because those references taken alone or in combination do not teach or suggest each and every limitation recited in the claim. In particular the cited references do not teach or suggest, “picture image conversion means for eliminating distortion of the entirety or a portion of the picture image selected by the selector means and for converting it into high quality picture image . . . wherein the picture image conversion means eliminates distortion and converts to a high quality picture in a single step” as recited in claim 1.

For reasons similar to those described above, independent claims 4, 5, 12, and 13 are also believed to be patentable.

Applicants respectfully submit that neither Kondo nor Adams provide support for the element missing in Driscoll and Sekine, and, therefore, independent claims 6, 10, and 11 are also believed to be patentable for similar reasons as those described above.

### **III. DEPENDENT CLAIMS**

The other claims are dependent from one of the claims discussed above and are therefore believed patentable for at least the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### **CONCLUSION**

Claims 1-14 are in condition for allowance. In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

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In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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